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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

O.S. SECURITY LLC,

Plaintiff,

v.

BRK BRANDS, INC.

Defendant.

**CASE NO. SACV 14-00310-AG
(DFMx)**

**JOINT STIPULATED MOTION
FOR ENTRY OF ORDER TO STAY
UPCOMING CLAIM
CONSTRUCTION DEADLINES**

O.S. SECURITY LLC,

Plaintiff,

v.

JOHN D. BRUSH & CO.,

Defendant.

**CASE NO. SACV 14-00314-AG
(DFMx)**

**JOINT STIPULATED MOTION
FOR ENTRY OF ORDER TO STAY
UPCOMING CLAIM
CONSTRUCTION DEADLINES**

O.S. SECURITY LLC,

Plaintiff,

v.

SARGENT MFG. CO., et al.,

Defendant.

**CASE NO. SACV 14-00318-AG
(DFMx)**

**JOINT STIPULATED MOTION
FOR ENTRY OF ORDER TO STAY
UPCOMING CLAIM
CONSTRUCTION DEADLINES**

O.S. SECURITY LLC,

CASE NO. SACV 14-00319-AG

1
2 Plaintiff,
3 v.
4 SCHLAGE LOCK COMPANY LLC, et
5 al.,
6 Defendant.

(DFMx)

JOINT STIPULATED MOTION
FOR ENTRY OF ORDER TO STAY
UPCOMING CLAIM
CONSTRUCTION DEADLINES

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8 On September 8, 2014, the Court held a joint scheduling conference in this
9 matter for the parties in each of the cases captioned above. Following that
10 conference, all of the parties have exchanged submissions under the Court's Standing
11 Patent Rules ("S.P.R.") in their separate cases.

12 Following the exchange of submissions under S.P.R. 3.1 and S.P.R. 3.2,
13 however, a number of issues have arisen among the parties. These issues relate to the
14 requirements of (and compliance with) S.P.R. 3.1 and 3.2 and the form and content of
15 the upcoming claim construction briefing. As these issues will directly affect claim
16 construction briefing, the Parties wish to resolve them prior to the submissions of a
17 Joint Claim Construction and Prehearing Statements in the various cases on December
18 8, 2014 and subsequent claim construction briefing. Consequently, the parties have
19 agreed to jointly request a stay of upcoming claim construction deadlines to give the
20 parties an opportunity to prepare and submit a joint statement of the issues for
21 resolution by the Court and for the Court to schedule a hearing.

22 If the stay is granted, the parties would submit a joint statement of issues on
23 November 25, 2014. The parties also respectfully request that the Court schedule a
24 hearing to address the issues in the joint statement at an appropriate time thereafter. A
25 proposed Order is enclosed.
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27
28

1 Dated: November 14, 2014

**LEE, JORGENSEN, PYLE &
KEWALRAMANI,**

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4 By: /s/
5 H. H. (Shashi) Kewalramani
6 Attorney for Plaintiff, O.S. Security LLC
7

8 Dated: November 14, 2014

ICE MILLER LLP

9
10 By: /s/ wish permission
11 Kevin J. O'Shea
12 Attorney for Defendant BRK Brands, Inc.
13

14
15 Dated: November 14, 2014

**WARD GREENBERG
HELLER & REIDY LLP**

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17 By: /s/ wish permission
18 Eric Ward
19 Attorney for Defendant John D. Brush d/b/a
20 Sentry Group

21 Dated: November 14, 2014

BARNES & THORNBURG LLP

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23 By: /s/ wish permission
24 Jeff M. Barron
25 Attorney for Defendant Schlage Lock
26 Company LLC

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1 Dated: November 14, 2014

RUTAN & TUCKER, LLP

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4 By: /s/ wish permission
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6 Attorney for Defendants Sargent Mfg. Co.
7 and ASSA Abloy, Inc.
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